

PREET BHARARA

United States Attorney for the
Southern District of New York

By: JACOB LILLYWHITE

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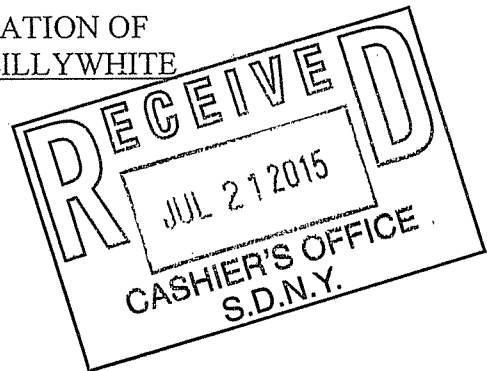
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE:

LETTER ROGATORY FOR
INTERNATIONAL JUDICIAL
ASSISTANCE FROM THE FOURTH
JUDICIAL DISTRICT OF NUEVO LEON,
MEXICO IN THE MATTER OF
JOSE LUIS PRADO DIAZ AND MARIA
DE LOURDES AYALA v. AGUSTINA
PRADO DIAZ
-----X

DECLARATION OF
JACOB LILLYWHITE

M 11-120



I, Jacob Lillywhite, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an Assistant United States Attorney in the Office of the United States Attorney for the Southern District of New York, counsel for the United States of America (the "Government"). I make this declaration upon information and belief based upon the attached exhibits and communications with personnel in the United States Department of Justice, to which a letter rogatory has been transmitted for execution. I make this declaration in support of the Government's request, pursuant to 28 U.S.C. § 1782(a),¹ for an order appointing me as a Commissioner for the purpose of obtaining information from Banorte-Ixe Securities International, Ltd.

¹ Section 1782(a) provides, in pertinent part, as follows:

2. In connection with a proceeding captioned *Jose Luis Prado Diaz & Maria de Lourdes Ayala v. Agustina Prado Diaz*, now pending in the Fourth Judicial District of Nuevo Leon, Mexico (the "Mexican Court"), the Mexican Court issued a letter rogatory seeking information from Banorte-Ixe Securities International, Ltd. A true and correct copy of the letter rogatory is attached hereto as Exhibit A.

3. An undated draft of a subpoena addressed to Banorte-Ixe Securities International, Ltd., Legal Department, 140 East 45th Street, 32 Floor New York, NY 10017, which the Government intends to serve upon my appointment as Commissioner, is attached hereto as Exhibit B.

4. To assist the Mexican Court in obtaining the requested information, I respectfully request that this Court appoint me as Commissioner as proposed in the *ex parte* order attached hereto as Exhibit C. No previous application for the relief sought herein has been

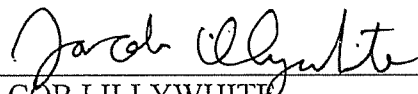
The district court of the district in which a person resides or is found may order him to give his testimony or statement or to produce a document or other thing for use in a proceeding in a foreign or international tribunal, including criminal investigations conducted before formal accusation. The order may be made pursuant to a letter rogatory issued, or request made, by a foreign or international tribunal or upon the application of any interested person and may direct that the testimony or statement be given, or the document or other thing be produced, before a person appointed by the court. By virtue of his appointment, the person appointed has power to administer any necessary oath and take the testimony or statement. The order may prescribe the practice and procedure, which may be in whole or part the practice and procedure of the foreign country or the international tribunal, for taking the testimony or statement or producing the document or other thing. To the extent that the order does not prescribe otherwise, the testimony or statement shall be taken, and the document or other thing produced, in accordance with the Federal Rules of Civil Procedure.

made.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

WHEREFORE, the United States respectfully requests that this Court enter the attached Order.

Dated: New York, New York
July 21, 2015



JACOB LILLYWHITE
Assistant United States Attorney

EXHIBIT A

SRE

SECCIÓN CONSULAR DE
MÉXICO EN WASHINGTON



WAS-1299

"Voluntary jurisdiction
proceeding, appointment of
guardian"
Washington, D.C.
May 28, 2015

Ms. Jeanne Davidson,
Director
Civil Division, Office of International Judicial
Assistance, U.S. Department of Justice
1100 L Street, NW Room 11006
Washington, D.C. 20530

Dear Ms. Davidson,

Pursuant to Articles 2 and 9 of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, and 87 of the Regulations of the Mexican Foreign Service Law, the undersigned would like to submit the enclosed letter of request for judicial assistance from the Honorable Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, to the Competent Authority in New York, NY. This letter has been issued in a "Voluntary jurisdiction proceeding, appointment of guardian", docket number 1335/2013.

The Mexican Authority kindly requests your assistance to obtain from Mr. Justin Chen and or the legal representative of THE BANORTE-IXE SECURITIES INTERNATIONAL, LTD, located at 140 East 45th Street, 32 floor, New York, N.Y. 10017, a report and/or a statement indicating the records related to the account number 3696 [REDACTED], specially showing if the main holder of said account is Agustina Prado Diaz and if the Joint holder is Maria Reva West and in which date the above mentioned people merge on the contract related to said account. also, the amounts provided by each of the above mentioned parties and the amounts reinvested by said persons and to indicate the amount of the deposits that belongs to each of the mentioned holders of the account..

The Honorable Mr. Javier Arturo Hurtado Leija has provided the originals of the letter of request which summarizes the facts in the case involved and its translation to the English language and the related documents from this file (and one copy).

The Honorable Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, assures reciprocity to the Competent Authority in New York, NY, in analogous cases, in recognition of the assistance that the proper authority may provide.

I thank you in advance for your kind attention to this matter.

Sincerely,

Juan Carlos Mendoza Sanchez
Head of the Consular Section

JAOP

JUN -1 2015

189-1-15 (48)

Consular Section of the Embassy of Mexico
1250 23rd Street NW, Washington DC, 20037, Suite 002
Tel. 202-736-1619 | Fax 202-234-4498
<http://consulmex.sre.gob.mx/washington>

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT
TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF
EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**

1) Sender

Name: Honorable Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, Mexico.

Address: Please forward all official communiqués to the Embassy of Mexico, Consular Office, 1250 23rd Street NW, Washington DC 20037, Tel. (202) 736-16-19.

2) Central Authority of the Requesting State

Name: Bertha Sanchez Miranda, Director of International Judicial Assistance, Office of Legal Affairs, Mexican Ministry of Foreign Affairs.

Address: Plaza Juarez No. 20, 5th floor, Col. Centro, C.P. 06010, Mexico, Distrito Federal.

3) Person to whom the executed request is to be returned:

Name: Juan Carlos Mendoza Sanchez, Head of the Consular Section

Address: Embassy of Mexico, Consular Section, 1250 23rd Street NW, Washington DC, 20037, Suite 002, Tel. (202) 736-1619

4) Central Authority of the Requested State

Name: Jeanne Davidson, Director, Civil Division, Office of International Judicial Assistance.

Address: U.S. Department of Justice, 1100 L Street, NW, Room 11006, Washington, D.C. 20530

II

5) In conformity with Article 3 of the Convention, the undersigned applicant has the honor to submit the following request:

6) (a) Requesting Judicial Authority (Article 3a)

Name: Honorable Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon.

Address: Please forward all official communiqués to the Embassy of Mexico, Consular Office, 1250 23rd Street NW, Washington DC, 20037, Tel. (202) 736-1519.

(b) To the Competent Judge of (Article 3a): Competent Authority in New York, NY

7) Names and addresses of the parties and their representatives (Article 3b)

(a) Plaintiff:

Name: Jose Luis Prado Diaz and Maria de Lourdes Ayala

Address:

Attorney in fact: Jose Luis Prado Diaz and Maria de Lourdes Ayala

(b) Defendants:

Name: Agustina Prado Diaz (appointment of guardian)

Address: Please forward all official communiqués to the Embassy of Mexico, Consular Office,
1250 23rd Street NW, Washington DC, 20037, Tel. (202) 736-1009.

8) Nature and purpose of the proceedings and summary of the facts (Article 3c)

This letter was issued in "Voluntary jurisdiction proceeding, appointment of guardian" trial in the case of Jose Luis Prado Diaz and Maria de Lourdes Ayala and Agustina Prado Diaz (appointment of guardian), case number 1335/2013. In this lawsuit the petitioner request the Competent Authority in New York, NY to obtain from Mr. Justin Chen and or the legal representative of THE BANORTE-IXE SECURITIES INTERNATIONAL, LTD, located at 140 East 45th Street, 32 floor, New York, N.Y. 10017, a report and/or a statement indicating the records related to the account number 3696 [REDACTED] specially showing if the main holder of said account is Agustina Prado Diaz and if the Joint holder is Maria Reva West and in which date the above mentioned people merge on the contract related to said account. also, the amounts provided by each of the above mentioned parties and the amounts reinvested by said persons and to indicate the amount of the deposits that belongs to each of the mentioned holders of the account.

9) Evidence to be obtained or other judicial act to be performed

To obtain from Mr. Justin Chen and or the legal representative of THE BANORTE-IXE SECURITIES INTERNATIONAL, LTD, located at 140 East 45th Street, 32 floor, New York, N.Y. 10017, a report and/or a statement indicating the records related to the account number 3696 [REDACTED], specially showing if the main holder of said account is Agustina Prado Diaz and if the Joint holder is Maria Reva West and in which date the above mentioned people merge on the contract related to said account. also, the amounts provided by each of the above mentioned parties and the amounts reinvested by said persons and to indicate the amount of the deposits that belongs to each of the mentioned holders of the account.

III

9) Identity and address of any person to be examined (Article 3e)

10) Special methods or procedures to be followed (Article 3(l) and 9)

The Firsth Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, requests that the

international letter of request enclosed, with its translation into English, be forwarded to the Competent Authority in New York, NY, at his/her earliest convenience shall then forward said response to the U.S. Department of Justice, which shall, in turn, send it back to this Consular Office for the execution of the international request for judicial assistance.

11) The fees and costs incurred, which are reimbursable under the second paragraph

of Article 14 of the Convention, will be borne by:

The parties: Please notify the Embassy of Mexico, Consular Office, at 1250 23rd Street NW, Washington DC 20037, Tel. (202) 736-1619 of any fee and/or costs incurred.

Reciprocity

Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, Mexico, assures reciprocity in analogous cases to the Competent Authority in New York, NY in recognition of the judicial assistance provided.

Signed in Washington D.C. on May 28, 2015

Juan Carlos Mendoza Sanchez,
Head of the Consular Section
of the Embassy of Mexico



PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO PRIMERO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
DE SAN PEDRO GARZA GARCIA N.L.

No. Oficio: 1095 /2015

No. Exp.: 1335/2013

Asunto: El que se
indica

CARTA ROGATORIA

A LA SECRETARIA DE RELACIONES EXTERIORES, DELEGACIÓN
NUEVO LEÓN.
P R E S E N T E.-

En cumplimiento a lo ordenado mediante auto de fecha 23
veintitrés de abril del 2015 dos mil quince, por medio del presente
oficio, me permito remitir a Usted en 02 dos fojas útiles, deducidas del
expediente judicial numero 1335/2013, relativo a las diligencias de
jurisdicción voluntaria sobre declaración de estado de interdicción
y nombramiento de tutor respecto de Agustina Prado Díaz,
promovidas por José Luis Prado Díaz, para que por su conducto gire
atenta carta rogatoria al Departamento de Justicia de los Estados
Unidos de América, a fin que se sirva requerir el informe ordenado en
el proveído dictado en fecha 23 veintitrés de abril del 2015 dos mil
quince, en el presente tramite y, hecho que sea lo anterior lo devuelva a
su lugar de origen.

Reiterándole las seguridades de mi más atenta y distinguida
consideración.

"SUFRAGIO EFECTIVO, NO REELECCIÓN"
SAN PEDRO GARZA GARCÍA, NUEVO LEÓN, A 29 DE ABRIL DEL 2015.
EL CIUDADANO JUEZ PRIMERO DE LO FAMILIAR DEL CUARTO
DISTRITO JUDICIAL DEL ESTADO.

LICENCIADO JAVIER ARTURO HURTADO LEÍJA.

ERICKA*

PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO PRIMERO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
SAN PEDRO GARZA GARCIA, N.L.

Vo.Bo

Corregidora #507 Nte. Planta Baja, Col. Centro
San Pedro Garza García N.L.
Teléfono: 20-20-63-32

Al contestar este Oficio, cítese el número
del mismo, fecha y Expediente



PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO DUODÉCIMO DE LO FAMILIAR
DEL PRIMER DISTRITO JUDICIAL
MONTERREY, N. L.

CARTA ROGATORIA

EL CIUDADANO LICENCIADO JAVIER ARTURO HURTADO LEÍJA, JUEZ PRIMERO DE LO FAMILIAR DEL CUARTO DISTRITO JUDICIAL EN EL ESTADO, CON RESIDENCIA EN SAN PEDRO GARZA GARCÍA, NUEVO LEÓN; AL DEPARTAMENTO DE JUSTICIA DE LOS ESTADOS UNIDOS DE AMÉRICA, A QUIEN TENGO EL HONOR DE DIRIGIRME, HAGO SABER LO SIGUIENTE: -----

Dentro del expediente número 1335/2013 relativo a las diligencias de jurisdicción voluntaria sobre declaración de estado de interdicción y nombramiento de tutor respecto de Agustina Prado Díaz, promovidas por José Luis Prado Díaz, se ha dictado un auto que a la letra dice: -----

San Pedro Garza García, Nuevo León a 23 veintitrés de abril del 2015 dos mil quince. Por recibido el escrito que suscriben los ciudadanos José Luis Prado Díaz y María de Lourdes Ayala Leal, con el carácter que ostentan dentro de los autos que integran el expediente judicial número 1335/2013, relativo a las diligencias de jurisdicción voluntaria sobre declaración de estado de interdicción y nombramiento de tutor respecto de Agustina Prado Díaz, en que se actúa. En atención al contenido de su solicitud, téngase a los comparecientes desahogando la vista que les fuere ordenada mediante el auto de fecha 14 catorce de abril del presente año, haciendo las manifestaciones que precisan en el escrito que se acuerda, de lo cual, tómese debida nota de su contenido y agréguese a sus antecedentes a fin de que surta los efectos legales a que haya lugar; lo anterior de conformidad con lo dispuesto en los artículos 51 y 55 del Código de Procedimientos Civiles del Estado. Por otro lado, en cuanto a su diversa petición, gírese por triplicado atenta carta rogatoria (exhorto internacional), por conducto de la Dirección general de Asuntos Jurídicos de la Secretaría de Relaciones Exteriores, Delegación Nuevo León al Departamento de Justicia de los Estados Unidos de América, a fin de que en auxilio de las labores de este juzgado, se sirva girar atento oficio a:

I. Justin Chen, CAMS CRCP Chief Compliance Officer Banorte-IXE Securities International, Ltd., con domicilio en 140 East 45th Street-32nd Floor New York, NY 10017 Estados Unidos de América, a fin de que realice lo siguiente:

1) se sirva informar el historial del contrato y la fecha de inicio de la cuenta 3696 [REDACTED], en la que aparecen como titular y cotitular, las ciudadanas Agustina Prado Díaz y María Reva West, respectivamente, así como cuando se fusionaron dichas personas en el contrato de la cuenta mencionada, las cantidades aportadas, rendimientos producidos y que se han reinvertido, además la participación que en la cuenta referida le corresponde a las ciudadanas Agustina Prado Díaz y María Reva West; ello a fin de estar en posibilidad proveer lo conducente a la administración de los bienes de la multitudada Agustina Prado Díaz, quien fuera declarada incapaz en el asunto que nos ocupa.

Ahora bien y en cumplimiento con los requisitos previstos en el artículo 3º de la Convención de la Haya Sobre la Obtención de Pruebas en el Extranjero en Materia Civil o Comercial, se le comunica lo siguiente:

Autoridad requirente y autoridad requerida.

1.- Autoridad requirente: Juez de lo Familiar del Cuarto Distrito Judicial en el Estado de Nuevo León, México.

ESTADOS UNIDOS MEXICANOS
PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO DUODÉCIMO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
SAN PEDRO GARZA GARCÍA, N.L.

2.- Autoridad requerida: Juez competente en el domicilio ubicado en 140 East 45th Street-32nd Floor New York, NY 10017 Estados Unidos de América.

Identidad y dirección de la partes y, en su caso, de sus representantes.

Promoviente y tutor de la incapaz Agustina Prado Díaz: José Luis Prado Díaz, Mexicano, mayor de edad, casado, empleado, con domicilio en la calle Circunvalación, número 201, colonia Protexa en Santa Catarina, Nuevo León, México.

Curadora de la incapaz Agustina Prado Díaz: María de Lourdes Ayala Leal, Mexicana, mayor de edad, casada, abogada, con domicilio en la calle Calzada del Valle, número 277-3 poniente, colonia del Valle en San Pedro Garza García, Nuevo León, México.

Representantes del señor José Luis Prado Díaz: la licenciada Claudia Verónica Solís Ruiz, con domicilio en la calle Circunvalación, número 201, colonia Protexa en Santa Catarina, Nuevo León, México.

Naturaleza y objeto de la instancia; así como exposición sumaria de los hechos.

Las diligencias de jurisdicción voluntaria sobre declaración de estado de interdicción y nombramiento de tutor respecto de Agustina Prado Díaz, radicadas por esta autoridad bajo el número de expediente 1335/2013, el cual, se declaró procedente mediante la sentencia definitiva dictada el 17 diecisiete de junio del 2014 dos mil catorce, siendo los hechos en los que fundamentó su acción el ciudadano José Luis Prado Díaz, los que a continuación se detallan:

"1.- Acreditando mi parentesco con el acta de nacimiento de mi hermana AGUSTINA PRADO DIAZ expedida por la Dirección General del Registro del Estado de Jalisco, siendo la numero 36, Libro 1, correspondiente al año 1917 de la oficina número 5 del Municipio de Jocotepec, Jalisco; y el acta de nacimiento del suscrito, expedida por el Director del Registro Civil en el Estado de Nuevo León bajo el numero 374 Libro 2 foja 91 levantada por el Oficial 5º Civil residente en la Ciudad de Monterrey, Nuevo León, de fecha 26 de Septiembre de 1933. 2.- Nuestros Padres JUAN PRADO y/o JUAN DE DIOS PRADO, BARAJAS y MARIA REFUGIO DIAZ ROBLEDO procrearon 7-siete hijos, siendo mis hermanos, el suscrito JOSE LUIS, AGUSTINA, BAUDELIA (finada), CRESCENCIANA (finada), MACARIA (finada), MARIA DE LOS ANGELES, JOSE DE JESUS todos de apellidos PRADO DIAZ. 3.- Desde hace más de 14-catorce años el suscrito es quien administra y opera todas y cada una de las cuentas bancarias y operaciones bursátiles de mi hermana AGUSTINA PRADO DIAZ, habiendo sido nombrado por la misma para esos trabajos, y a la fecha, he logrado incrementar su patrimonio en forma considerable. 4.- Por desgracia, la capacidad intelectual de mi hermana se deteriora por el transcurso de los años en forma progresiva diagnosticándole los médicos Demencia Senil encontrándose actualmente incapacitada para la toma de decisiones. Los médicos de cabecera de mi hermana y quienes la han atendido desde hace muchos años y realizado el diagnóstico de dicha enfermedad son los Drs. KOQUE HERNAN CAMPA, NÚÑEZ, JOSE LUIS ASSAD MORELL y JOSE FELIPE VILLEGAS ELIZONDO. Mismos



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DEL PRIMER DISTRITO JUDICIAL
MONTERREY, N. L.

que han presentado por escrito los informes que se anexan al presente y que desde este momento requiero a su Señoría sean llamados para su ratificación. 5.- Como ya lo mencione en el presente escrito, actualmente sobrevivimos cuatro de los siete hermanos, siendo mi hermana AGUSTINA PRADO DIAZ, y mis otros dos hermanos de nombre MARIA DE LOS ANGELES PRADO DIAZ, JOSE DE JESUS PRADO DIAZ y el suscrito JOSÉ LUIS PRADO DIAZ; estos dos últimos se encuentran de acuerdo en que el firmante sea judicialmente el Tutor Definitivo de nuestra hermana AGUSTINA PRADO DIAZ, y reconocen que ella misma, cuando se encontraba en completo estado de salud me confió la administración de sus bienes e inversiones además de que confirman que el suscrito es quien cuida, atiende, protege y vela para brindar una mejor calidad de vida a nuestra hermana AGUSTINA PRADO DIAZ, ya que me encuentro viviendo desde hace muchos años con la misma. Estas manifestaciones de aprobación de la Tutoría Definitiva del suscrito para mi hermana, fueron realizados ante Notario Público, correspondiente a la entidad en donde viven mis hermanos y las cuales se anexan al presente. 6.- como ya lo mencioné, con el pasar del tiempo, a consecuencia de su edad, mi hermana AGUSTINA PRADO DIAZ padece de Demencia Senil, situación que le es imposible tomar decisiones y realizar trámites legales y de negocios, motivo por el cual, el suscrito promuevo las presentes diligencias con el fin de que sea declarado el estado de interdicción de mi hermana y así mismo se me nombre como tutor definitivo, a fin de que el suscrito represente a mi hermana en los actos que pudieran llevarse a cabo durante la incapacidad de la misma.

Los actos de instrucción u otros actos judiciales a realizar.

1) se sirva informar el historial del contrato y la fecha de inicio de la cuenta 3696 en la que aparecen como titular y cotitular, las ciudadanas Agustina Prado Díaz y María Reva West, respectivamente, así como cuando se fusionaron dichas personas en el contrato de la cuenta mencionada, las cantidades aportadas, rendimientos producidos y que se han reinvertido, además la participación que en la cuenta referida le corresponde a las ciudadanas Agustina Prado Díaz y María Reva West; ello a fin de estar en posibilidad proveer lo conducente a la administración de los bienes de Agustina Prado Díaz, quien fuera declarada incapaz en el asunto que nos ocupa.

Los nombres y direcciones de las personas a oír.

Justin Chen, CAMS-CRCP Chief Compliance Officer Banorte-IXE Securities International, Ltd., con domicilio en 140 East 45th Street-32nd Floor New York, NY, 10017 Estados Unidos de América.

Los documentos u otros objetos a examinar.

Sin anexos.

Lo anterior, a fin de que en auxilio de las labores de este juzgado se sirva diligenciar el presente proveído, debiendo para tal efecto gestionar las documentales referidas y realizado que lo sea, se devuelva a este su lugar de origen, seguro de reciprocidad en casos análogos. Ello de conformidad con los artículos 26, 47, 227 y 952 del Código de Procedimientos Civiles vigente en el Estado, así como con el artículo 44 fracción V de la Ley del Servicio Exterior Mexicano y el numeral 87 del Reglamento de la Ley del Servicio Exterior Mexicano. Notifíquese. Así lo acuerda y firma el ciudadano licenciado Javier Arturo Hurtado Leija, Juez Primero de lo Familiar del Cuarto Distrito Judicial del Estado, actuando ante la presencia de la ciudadana licenciada María Lourdes

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DEL CUARTO DISTRITO JUDICIAL
SAN PEDRO GARZA GARCÍA, N.L.

González García, secretario que autoriza. Doy fe. Rubricas. La resolución que antecede se publicó en el boletín judicial número 6577 del día 23 veintitrés de abril del año 2015 dos mil quince. Lo anterior de conformidad con el artículo 76 del Código de Procedimientos Civiles vigente en el Estado. Doy fe. Rubrica: Ciudadana Secretario.

PARA QUE LO QUE POR MI MANDATO TENGA SU FIEL Y LEGAL CUMPLIMIENTO, EN NOMBRE DE LOS PODERES DE LA NACIÓN Y DE LOS PARTICULARES DEL ESTADO DE NUEVO LEÓN, EXHORTO Y REQUIERO QUE TAN PRONTO SE ENCUENTRE EL PRESENTE EN SU PODER SE SIRVA DILIGENCIARLO EN SUS TÉRMINOS, SEGURO DE MI RECIPROCIDAD EN CASOS ANÁLOGOS, VA EN 02 DOS FOJAS ÚTILES, Y ES DADO EN SAN PEDRO GARZA GARCIA, NUEVO LEÓN, A 29 VEINTINUEVE DE ABRIL DEL 2015 DOS MIL QUINCE. DOY FE.

EL C. JUEZ DEL JUZGADO PRIMERO DE LO FAMILIAR DEL CUARTO DISTRITO JUDICIAL EN EL ESTADO DE NUEVO LEÓN.

LIC. JAVIER ARTURO HURTADO LEÍJA.

EST. DE NUEVO LEÓN
JUEZ DEL CUARTO DISTRITO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
C. SECRETARIO DEL JUZGADO PRIMERO
DE LO FAMILIAR DEL CUARTO DISTRITO
JUDICIAL EN EL ESTADO.

LIC. NORMA NELY CARREÑO RAMÍREZ.

ERUCKA®

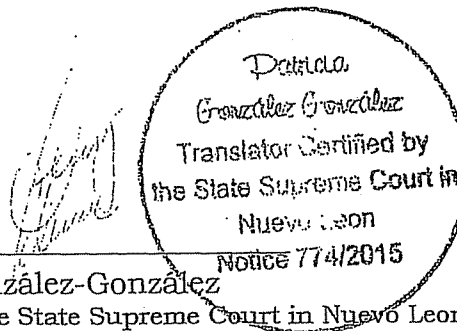
Patricia González-González
Certified Translator
Jiménez #465, Floor 2, Suite 2 | Col. Centro
San Pedro Garza García, N.L. México 66200
Tel. (81) 8356.12.00 | Mobile (181) 1255.8554

COPY

May 07, 2015

Certification by Translator

I, Patricia González, hereby certify that I am fluent in English and Spanish languages, and that the attached document is an accurate English translation of the original Spanish-language document. I declare under penalty of perjury that, to the best of my knowledge and belief, the foregoing is true and correct.



Patricia González-González
Certified by the State Supreme Court in Nuevo Leon, Mexico
Certification No. 774/2015
ATA member 240784

COPY

[Emblem of the United Mexican States that says: JUDICIARY OF THE STATE OF NUEVO LEÓN, FIRST FAMILY COURT OF THE FOURTH JUDICIAL DISTRICT, SAN PEDRO GARZA GARCÍA, N.L.]	<p>[Barcode] JF140048359305 PROCEDURES PRESENTATION OF EVIDENCE / LETTER ROGATORY Dossier: 1335 / 2013 0042</p>
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San Pedro Garza García, Nuevo León, April 23 twenty-three 2015 two thousand and fifteen.

Consider received the pleading signed by José Luis Prado Díaz and María de Lourdes Ayala Leal with the capacity in which they are acting as stated in the records incorporated in judicial dossier number 1335/2013, relating to the present voluntary jurisdiction proceedings on the declaration of a state of interdiction and appointment of a guardian for Agustina Prado Díaz.

Regarding to the contents of your request, have the appearing parties filed the decree ordered on April 14 of this year, stating the declarations mentioned in the document, which having noted its content and add it to its recitals in order to become effective in all legal purposes, the foregoing according to the provided in articles 51 and 55 of the Code of Civil Procedures of the State.

Regarding to your special petition, let a letter rogatory (international letter rogatory) be sent in triplicate, through the Nuevo León Regional Office of the Legal Affairs Department of the Ministry of Foreign Affairs, to the Department of Justice of the United States of America, for it, in support of the work of this court, to kindly send an official letter to:

I. Justin Chen, CAMS CRCP Chief Compliance Officer Banorte- IXE Securities International, Ltd., addressed at 140 East 45th Street- 32nd Floor New York, NY 10017 United States of America, for him to do the following:

Doña
Groceries
Translator
the State Supreme Court in
Nuevo León
Notice 774-2014

please report the track record of the contract and the starting date of account number 3696 in which Agustina Prado Díaz and Maria Reva West appear as holder and joint name, respectively, as well as when said people merged in the contract for the aforementioned account, the amounts contributed, returns that have been produced and that have been reinvested, as well as the share in the aforementioned account that corresponds to Agustina Prado Díaz and María Reva West; this is in order to be in a position to make any decision on the administration of the assets of the cited Agustina Prado Díaz, who was declared incapable for the matter in question.

Therefore, in compliance with the requirements set forth in article 3 of the Hague Convention on Taking of Evidence Abroad in Civil or Commercial Matters, you are informed of the following:

Claimant authority and responding authority.

- 1.- Claimant authority: Judge of the Family Court of the Fourth Judicial District in the State of Nuevo León, Mexico.
- 2.- Responding authority: Judge in jurisdiction at the domicile located at 140 East 45th Street- 32nd Floor New York, NY 10017 United States of America.

Identity and address of the parties and, when applicable, of their representatives.

Petitioner and guardian of the incapable, Agustina Prado Díaz: José Luis Prado Díaz, Mexican, of legal age, married, employee, addressed at Calle Circunvalación, number 201, Colonia Protexa, Santa Catarina, Nuevo León, Mexico.

Legal Guardian of the incapable, Agustina Prado Díaz: María de Lourdes Ayala Leal, Mexicana, of legal age, married, lawyer, domiciled at Calle Calzada del Valle, number 277- 3 poniente, Colonia del Valle, San Pedro Garza García, Nuevo León, Mexico.

Representatives of José Luis Prado Díaz: Claudia Verónica Solís Ruiz, domiciled at Calle Circunvalación, number 201, Colonia Protexa, Santa Catarina, Nuevo León, Mexico.

Nature and purpose of the instance along with a brief summary of the facts.

The voluntary jurisdiction proceedings on the declaration of a state of interdiction and appointment of a guardian for Agustina Prado Díaz, heard by this authority under dossier number 1335/2013, which was declared admissible in a final judgment passed on June 17th

seventeenth 2014-two thousand and fourteen, with the facts on which José Luis Prado Díaz grounded his action being as follows:

"1.- Certifying my relationship with birth certificate of my sister, AGUSTINA PRADO DIAZ, issued by the Civil Registry Bureau of the State of Jalisco, number 36, Book 1, corresponding to the year 1917, office number 5 of the Municipality of Jocotepec, Jalisco; and my own birth certificate issued by the Director of the Civil Registry in the State of Nuevo León under number 374, Book 2, pages 91, issued by Civil Registrar 5 in the city of Monterrey, Nuevo León, dated September 26th, 1933. 2.- Our Parents, JUAN PRADO and/or JUAN DE DIOS PRADO BARAJAS and MARÍA REFUGIO DIAZ ROBLEDO procreated 7- seven children, namely myself, JOSE LUIS, and my siblings, AGUSTINA, BAUDELIA (deceased), CRESCENCIA (deceased), MACARIA (deceased), MARIA DE LOS ANGELES, JOSE DE JESUS, all surnamed, PRADO DIAZ. 3.- More than 14-fourteen years ago, I, the undersigned, am the person who administers and operates each and every one of the bank accounts and stock market operations of my sister, AGUSTINA PRADO DIAZ, having been appointed by her to do these jobs and, to date, I have managed to considerably increase her equity. 4.- Unfortunately, the intellectual capacity of my sister is deteriorating progressively over the years, as the doctors have diagnosed that she has Senile Dementia, being unable of decision-taking at this stage. My sister's physicians, who have attended her for many years and are responsible for diagnosing said illness, are Dr. KOQUE HERNAN CAMPA NÚÑEZ, DR. JOSE LUIS ASSAD MORELL, and DR. JOSE FELIPE VILLEGAS ELIZONDO. Said doctors have presented the written reports attached hereto and, as of now, I ask your Honor for them to be called for the ratification of said reports. 5.- As already been mentioned in this motion, at the present time four of the seven siblings survive, namely my sister AGUSTINA PRADO DIAZ, and my other two siblings called MARIA DE LOS ANGELES PRADO DIAZ, JOSE DE JESUS PRADO DIAZ, and myself, JOSÉ LUIS PRADO DIAZ; the two latter agree with me, the undersigned, to be appointed by the courts as Sole Guardian of our sister, AGUSTINA PRADO DIAZ, and acknowledged that she, when she was in full health, entrusted me with the administration of her assets and investments, while at the same time they confirm that I, the undersigned, the person who takes care of, looks after, and protects her, do my best to provide a better quality of life to our sister, AGUSTINA PRADO DIAZ, as I have been living with her many years ago. These declarations of their approval as Sole Guardian of my sister were made before a Notary Public corresponding to the entity where my siblings live and are attached hereto. 6.- as I have already mentioned, over time, as a consequence of her age, my sister AGUSTINA PRADO DIAZ, suffers from Senile Dementia, which means that she is incapable of making decisions and legal formalities and business affairs; for which reason I, the undersigned, am filing these proceedings for the declaration of the state of Incapacity of my sister and also for me to be appointed as Sole Guardian, in order that I, the undersigned, may represent my sister in any acts that may need to be executed while she is incapable.

Notary Public
Granados González
Translator Certified by
the State Supreme Court in
Nuevo León
Notice 77 of 2014

Pre-trial proceedings and judicial acts to be done.

1) please report the track record of the contract and the starting date of account number 3696 in which Agustina Prado Díaz and María Reva West appear as holder and joint name, respectively, as well as when said people merged in the contract for the aforementioned account, the amounts contributed, returns produced and that have been reinvested, as well as the share in the aforementioned account that corresponds to Agustina Prado Díaz and María Reva West; this is in order to be in a position to make any decision on the administration of the assets of the Agustina Prado Díaz, who was declared incapable for the matter in question.

Names and addresses of the people to be served process.

Justin Chen, CAMS CRCP Chief Compliance Officer Banorte- IXE Securities International, Ltd., with his address at 140 East 45th Street- 32nd Floor New York NY 10017 United States of America.

The documents or other objects to be examined.

No attachments.

The foregoing in order that, in support of the work of this court, send this document, arranging, to that end, the aforementioned documentary evidence and, having done so, returning it to its place

of origin, with the assurance that we will be glad to reciprocate in similar cases. All this in compliance with the articles 26, 47, 227, and 952 of the Code of Civil Procedures (*Código de Procedimientos Civiles*) in force in the State, as well as with article 44 subsection V of the Mexican Foreign Service Law (*Ley del Servicio Exterior Mexicano*) and numeral 87 of the Regulations of the Mexican Foreign Service Law.

Let notice be given.- Javier Arturo Hurtado Leija, Judge of Family Court One of the Fourth Judicial District of the State, so rules and signs, as witnessed by María Lourdes González García, Court Clerk. I do attest.-

The above ruling was published in court bulletin number 6540 on February 25th twenty-fifth 2015-two thousand and fifteen, the foregoing for purposes of articles 76 and 77 of the Code of Civil Procedures of the State.- I do attest.-

Court Clerk

L/MLGG/CMS

DATA OF THE DOSSIER:

CASE: ORDINARY CIVIL LAWSUIT ON THE STATE OF INTERDICTION AND APPOINTMENT OF A GUARDIAN.

PLAINTIFF: JOSE LUIS PRADO DIAZ

DEFENDANT: RE. AGUSINA PRADO DIAZ

04 - USERS TV:

*PARTY TYPE: Plaintiff *PARTY: JOSE LUIS PRADO DIAZ *USER T.V.: claudiasolis

*DATE OF ACTIVATION: 09/20/2013 *SUBMISSIONS: NO *NOTIFICATIONS: YES

*PARTY TYPE: Other *PARTY: MARIA DE LOURDES AYALA LEAL *USER T.V.:

*DATE OF ACTIVATION: 08/05/2014 *SUBMISSIONS: NO *NOTIFICATIONS:

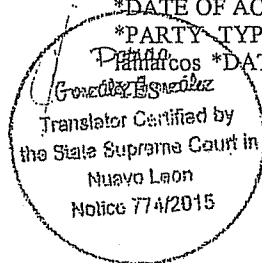


EXHIBIT B

UNITED STATES DISTRICT COURT

for the

Southern District of New York

IN RE: LETTER ROGATORY FOR INTERNATIONAL
JUDICIAL ASSISTANCE FROM THE FOURTH
JUDICIAL DISTRICT OF NUEVO LEON, MEXICO, IN
THE MATTER OF JOSE LUIS PRADO DIAZ & MARIA
DE LOURDES AYALA v. AGUSTINA PRADO DIAZ

Civil Action No. M 11-120

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Attn: Compliance Department, Banorte-Ixe Securities International, Ltd.
140 East 45th Street, 32nd Floor New York, NY 10017

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Pursuant to the letter rogatory attached as Rider A.

Place: U.S. Attorney's Office, Southern District of New York
86 Chambers Street, 3rd Floor, New York, NY 10007

Date and Time:

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) U.S.A. on behalf of
the Fourth Judicial District of Nuevo Leon, Mexico _____, who issues or requests this subpoena, are:
Jacob Lillywhite, Assistant United States Attorney, U.S. Attorney's Office for the Southern District of New York,
86 Chambers Street, 3rd Floor, New York, NY 10007. Email: jacob.lillywhite@usdoj.gov. Tel.: 212-637-2639

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. M 11-120

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* Banorte-Ixe Securities International, Ltd.
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Rider A

SRE

SECCIÓN CONSULAR DE
MÉXICO EN WASHINGTON



WAS-1299

"Voluntary jurisdiction
proceeding, appointment of
guardian"
Washington, D.C.
May 28, 2015

Ms. Jeanne Davidson,
Director
Civil Division, Office of International Judicial
Assistance, U.S. Department of Justice
1100 L Street, NW Room 11006
Washington, D.C. 20530

Dear Ms. Davidson,

Pursuant to Articles 2 and 9 of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, and 87 of the Regulations of the Mexican Foreign Service Law, the undersigned would like to submit the enclosed letter of request for judicial assistance from the Honorable Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, to the Competent Authority in New York, NY. This letter has been issued in a "Voluntary jurisdiction proceeding, appointment of guardian", docket number 1335/2013.

The Mexican Authority kindly requests your assistance to obtain from Mr. Justin Chen and or the legal representative of THE BANORTE-IXE SECURITIES INTERNATIONAL, LTD, located at 140 East 45th Street, 32 floor, New York, N.Y. 10017, a report and/or a statement indicating the records related to the account number 3696 [REDACTED], specially showing if the main holder of said account is Agustina Prado Diaz and if the Joint holder is Maria Reva West and in which date the above mentioned people merge on the contract related to said account. also, the amounts provided by each of the above mentioned parties and the amounts reinvested by said persons and to indicate the amount of the deposits that belongs to each of the mentioned holders of the account.

The Honorable Mr. Javier Arturo Hurtado Leija has provided the originals of the letter of request which summarizes the facts in the case involved and its translation to the English language and the related documents from this file (and one copy).

The Honorable Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, assures reciprocity to the Competent Authority in New York, NY, in analogous cases, in recognition of the assistance that the proper authority may provide.

I thank you in advance for your kind attention to this matter.

Sincerely,

Juan Carlos Mendoza Sanchez
Head of the Consular Section

JAOP

JUN -1 2015

189-1-15 (48)

Consular Section of the Embassy of Mexico
1250 23rd Street NW, Washington DC, 20037, Suite 002
Tel. 202-736-1619 | Fax 202-234-4498
<http://consulmex.sre.gob.mx/washington>

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT
TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF
EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**

1) Sender

Name: Honorable Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, Mexico.

Address: Please forward all official communiqués to the Embassy of Mexico, Consular Office, 1250 23rd Street NW, Washington DC 20037, Tel. (202) 736-16-19.

2) Central Authority of the Requesting State

Name: Bertha Sanchez Miranda, Director of International Judicial Assistance, Office of Legal Affairs, Mexican Ministry of Foreign Affairs.

Address: Plaza Juarez No. 20, 5th floor, Col. Centro, C.P. 06010, Mexico, Distrito Federal.

3) Person to whom the executed request is to be returned:

Name: Juan Carlos Mendoza Sanchez, Head of the Consular Section

Address: Embassy of Mexico, Consular Section, 1250 23rd Street NW, Washington DC, 20037, Suite 002, Tel. (202) 736-1619

4) Central Authority of the Requested State

Name: Jeanne Davidson, Director, Civil Division, Office of International Judicial Assistance.

Address: U.S. Department of Justice, 1100 L Street, NW, Room 11006, Washington, D.C. 20530

II

5) In conformity with Article 3 of the Convention, the undersigned applicant has the honor to submit the following request:

6) (a) Requesting Judicial Authority (Article 3a)

Name: Honorable Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon.

Address: Please forward all official communiqués to the Embassy of Mexico, Consular Office, 1250 23rd Street NW, Washington DC, 20037, Tel. (202) 736-1519.

(b) To the Competent Judge of (Article 3a): Competent Authority in New York, NY

7) Names and addresses of the parties and their representatives (Article 3b)

(a) Plaintiff:

Name: Jose Luis Prado Diaz and Maria de Lourdes Ayala

Address:

Attorney in fact: Jose Luis Prado Diaz and Maria de Lourdes Ayala

(b) Defendants:

Name: Agustina Prado Diaz (appointment of guardian)

Address: Please forward all official communiqués to the Embassy of Mexico, Consular Office,
1250 23rd Street NW, Washington DC, 20037, Tel. (202) 736-1009.

8) Nature and purpose of the proceedings and summary of the facts (Article 3c)

This letter was issued in "Voluntary jurisdiction proceeding, appointment of guardian" trial in the case of Jose Luis Prado Diaz and Maria de Lourdes Ayala and Agustina Prado Diaz (appointment of guardian), case number 1335/2013. In this lawsuit the petitioner request the Competent Authority in New York, NY to obtain from Mr. Justin Chen and or the legal representative of THE BANORTE-IXE SECURITIES INTERNATIONAL, LTD, located at 140 East 45th Street, 32 floor, New York, N.Y. 10017, a report and/or a statement indicating the records related to the account number 3696 [REDACTED] specially showing if the main holder of said account is Agustina Prado Diaz and if the Joint holder is Maria Reva West and in which date the above mentioned people merge on the contract related to said account. also, the amounts provided by each of the above mentioned parties and the amounts reinvested by said persons and to indicate the amount of the deposits that belongs to each of the mentioned holders of the account.

9) Evidence to be obtained or other judicial act to be performed

To obtain from Mr. Justin Chen and or the legal representative of THE BANORTE-IXE SECURITIES INTERNATIONAL, LTD, located at 140 East 45th Street, 32 floor, New York, N.Y. 10017, a report and/or a statement indicating the records related to the account number 3696 [REDACTED], specially showing if the main holder of said account is Agustina Prado Diaz and if the Joint holder is Maria Reva West and in which date the above mentioned people merge on the contract related to said account. also, the amounts provided by each of the above mentioned parties and the amounts reinvested by said persons and to indicate the amount of the deposits that belongs to each of the mentioned holders of the account.

III

9) Identity and address of any person to be examined (Article 3e)

10) Special methods or procedures to be followed (Article 3(l) and 9)

The First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, requests that the

international letter of request enclosed, with its translation into English, be forwarded to the Competent Authority in New York, NY, at his/her earliest convenience shall then forward said response to the U.S. Department of Justice, which shall, in turn, send it back to this Consular Office for the execution of the international request for judicial assistance.

11) The fees and costs incurred, which are reimbursable under the second paragraph

of Article 14 of the Convention, will be borne by:

The parties: Please notify the Embassy of Mexico, Consular Office, at 1250 23rd Street NW, Washington DC 20037, Tel. (202) 736-1619 of any fee and/or costs incurred.

Reciprocity

Mr. Javier Arturo Hurtado Leija, First Judge of Family Matters, of the Fourth Judicial District in Nuevo Leon, Mexico, assures reciprocity in analogous cases to the Competent Authority in New York, NY in recognition of the judicial assistance provided.

Signed in Washington D.C. on May 28, 2015

Juan Carlos Mendoza Sanchez,
Head of the Consular Section
of the Embassy of Mexico



PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO PRIMERO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
DE SAN PEDRO GARZA GARCIA N.L.

No. Oficio: 1095 /2015

No. Exp.: 1335/2013

Asunto: El que se indica

CARTA ROGATORIA

A LA SECRETARIA DE RELACIONES EXTERIORES, DELEGACIÓN
NUEVO LEÓN.
P R E S E N T E.-

En cumplimiento a lo ordenado mediante auto de fecha 23 veintitrés de abril del 2015 dos mil quince, por medio del presente oficio, me permito remitir a Usted en 02 dos fojas útiles, deducidas del expediente judicial numero 1335/2013, relativo a las diligencias de jurisdicción voluntaria sobre declaración de estado de interdicción y nombramiento de tutor respecto de Agustina Prado Díaz, promovidas por José Luis Prado Díaz, para que por su conducto gire atenta carta rogatoria al Departamento de Justicia de los Estados Unidos de América, a fin que se sirva requerir el informe ordenado en el proveído dictado en fecha 23 veintitrés de abril del 2015 dos mil quince, en el presente tramite y, hecho que sea lo anterior lo devuelva a su lugar de origen.

Reiterándole las seguridades de mi más atenta y distinguida consideración.

"SUFRAGIO EFECTIVO, NO REELECCIÓN"
SAN PEDRO GARZA GARCÍA, NUEVO LEÓN, A 29 DE ABRIL DEL 2015.
EL CIUDADANO JUEZ PRIMERO DE LO FAMILIAR DEL CUARTO
DISTRITO JUDICIAL DEL ESTADO.

ERICKA*

LICENCIADO JAVIER ARTURO HURTADO LEÍJA.

PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO PRIMERO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
SAN PEDRO GARZA GARCIA, N.L.

Po. 6o

Corregidora #507 Nte. Planta Baja, Col. Centro
San Pedro Garza García N.L.
Teléfono: 20-20-63-32

Al contestar este Oficio, cítese el número del mismo, fecha y Expediente



PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO DUODÉCIMO DE LO FAMILIAR
DEL PRIMER DISTRITO JUDICIAL
MONTERREY, N. L.

CARTA ROGATORIA

EL CIUDADANO LICENCIADO JAVIER ARTURO HURTADO
LEÍJA, JUEZ PRIMERO DE LO FAMILIAR DEL CUARTO DISTRITO
JUDICIAL EN EL ESTADO, CON RESIDENCIA EN SAN PEDRO
GARZA GARCÍA, NUEVO LEÓN; AL DEPARTAMENTO DE JUSTICIA
DE LOS ESTADOS UNIDOS DE AMÉRICA, A QUIEN TENGO EL
HONOR DE DIRIGIRME, HAGO SABER LO SIGUIENTE: -----

Dentro del expediente número 1335/2013 relativo a las
diligencias de jurisdicción voluntaria sobre declaración de estado
de interdicción y nombramiento de tutor respecto de Agustina
Prado Díaz, promovidas por José Luis Prado Díaz, se ha dictado un
auto que a la letra dice: -----

San Pedro Garza García, Nuevo León a 23 veintitrés de abril del
2015 dos mil quince. Por recibido el escrito que suscriben los
ciudadanos José Luis Prado Díaz y María de Lourdes Ayala Leal, con
el carácter que ostentan dentro de los autos que integran el expediente
judicial número 1335/2013, relativo a las diligencias de jurisdicción
voluntaria sobre declaración de estado de interdicción y
nombramiento de tutor respecto de Agustina Prado Díaz, en que se
actúa. En atención al contenido de su solicitud, téngase a los
comparecientes desahogando la vista que les fuere ordenada mediante
el auto de fecha 14 catorce de abril del presente año, haciendo las
manifestaciones que precisan en el escrito que se acuerda, de lo cual,
tómese debida nota de su contenido y agréguese a sus antecedentes a
fin de que surta los efectos legales a que haya lugar; lo anterior de
conformidad con lo dispuesto en los artículos 51 y 55 del Código de
Procedimientos Civiles del Estado. Por otro lado, en cuanto a su diversa
petición, gírese por triplicado atenta carta rogatoria (exhorto
internacional), por conducto de la Dirección general de Asuntos
Jurídicos de la Secretaría de Relaciones Exteriores, Delegación
Nuevo León al Departamento de Justicia de los Estados Unidos de
América, a fin de que en auxilio de las labores de este juzgado, se sirva
girar atento oficio a:

I. Justin Chen, CAMS CRCP Chief Compliance Officer Bariorte-IXE
Securities International, Ltd., con domicilio en 140 East 45th Street-
32nd Floor New York, NY 10017 Estados Unidos de América, a fin de
que realice lo siguiente:

1) se sirva informar el historial del contrato y la fecha de inicio de la
cuenta 3696, en la que aparecen como titular y cotitular, las
ciudadanas Agustina Prado Díaz y María Reva West,
respectivamente, así como cuando se fusionaron dichas personas
en el contrato de la cuenta mencionada, las cantidades aportadas,
rendimientos producidos y que se han reinvertido, además la
participación que en la cuenta referida le corresponde a las
ciudadanas Agustina Prado Díaz y María Reva West; ello a fin de
estar en posibilidad proveer lo conducente a la administración de los
bienes de la multicitada Agustina Prado Díaz, quien fuera declarada
incapaz en el asunto que nos ocupa.

Ahora bien y en cumplimiento con los requisitos previstos en el artículo
3º de la Convención de la Haya Sobre la Obtención de Pruebas en el
Extranjero en Materia Civil o Comercial, se le comunica lo siguiente:

Autoridad requirente y autoridad requerida.

1.- Autoridad requirente: Juez de lo Familiar del Cuarto Distrito
Judicial en el Estado de Nuevo León, México.



PODER JUDICIAL DEL
ESTADO DE NUEVO LEÓN
JUZGADO DUODÉCIMO DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
SAN PEDRO GARZA GARCÍA, N. L.

2.- Autoridad requerida: Juez competente en el domicilio ubicado en 140 East 45th Street-32nd Floor, New York, NY 10017 Estados Unidos de América.

Identidad y dirección de la partes y, en su caso, de sus representantes.

Promoviente y tutor de la incapaz Agustina Prado Díaz: José Luis Prado Díaz, Mexicano, mayor de edad, casado, empleado, con domicilio en la calle Circunvalación, número 201, colonia Protexa en Santa Catarina, Nuevo León, México.

Curadora de la incapaz Agustina Prado Díaz: María de Lourdes Ayala Leal, Mexicana, mayor de edad, casada, abogada, con domicilio en la calle Calzada del Valle, número 277-3 poniente, colonia del Valle en San Pedro Garza García, Nuevo León, México.

Representantes del señor José Luis Prado Díaz: la licenciada Claudia Verónica Solís Ruiz, con domicilio en la calle Circunvalación, número 201, colonia Protexa en Santa Catarina, Nuevo León, México.

Naturaleza y objeto de la instancia, así como exposición sumaria de los hechos.

Las diligencias de jurisdicción voluntaria sobre declaración de estado de interdicción y nombramiento de tutor respecto de Agustina Prado Díaz, radicadas por esta autoridad bajo el número de expediente 1335/2013, el cual, se declaró procedente mediante la sentencia definitiva dictada el 17 diecisiete de junio del 2014 dos mil catorce, siendo los hechos en los que fundamentó su acción el ciudadano José Luis Prado Díaz, los que a continuación se detallan:

"1.- Acreditando mi parentesco con el acta de nacimiento de mi hermana AGUSTINA PRADO DIAZ expedida por la Dirección General del Registro del Estado de Jalisco, siendo la numero 36, Libro 1, correspondiente al año 1917 de la oficina número 5 del Municipio de Jocotepec, Jalisco; y el acta de nacimiento del suscrito, expedida por el Director del Registro Civil en el Estado de Nuevo León bajo el numero 374 Libro 2 foja 91 levantada por el Oficial 5º Civil residente en la Ciudad de Monterrey, Nuevo León, de fecha 26 de Septiembre de 1933. 2.- Nuestros Padres JUAN PRADO y/o JUAN DE DIOS PRADO, BARAJAS y MARÍA REFUGIO DIAZ ROBLEDO procrearon 7-siete hijos, siendo mis hermanos, el suscrito JOSE LUIS, AGUSTINA, BAUDELIA (finada), CRESCENCIANA (finada), MACARIA (finada), MARIA DE LOS ANGELES, JOSE DE JESUS todos de apellidos PRADO DIAZ. 3.- Desde hace más de 14-catorce años el suscrito es quien administra y opera todas y cada una de las cuentas bancarias y operaciones bursátiles de mi hermana AGUSTINA PRADO DIAZ, habiendo sido nombrado por la misma para esos trabajos, y a la fecha, he logrado incrementar su patrimonio en forma considerable. 4.- Por desgracia, la capacidad intelectual de mi hermana se deteriora por el transcurso de los años en forma progresiva diagnosticándole los médicos Demencia Senil, encontrándose actualmente incapacitada para la toma de decisiones. Los médicos de cabecera de mi hermana y quienes la han atendido desde hace muchos años y realizado el diagnóstico de dicha enfermedad son los Drs. KOQUE HERNAN CAMPA, NÚÑEZ, JOSE LUIS ASSAD MORELL y JOSE FELIPE VILLEGAS ELIZONDO. Mismos



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MONTERREY, N. L.

que han presentado por escrito los informes que se anexan al presente y que desde este momento requiero a su Señoría sean llamados para su ratificación. 5.- Como ya lo mencione en el presente escrito, actualmente sobrevivimos cuatro de los siete hermanos, siendo mi hermana AGUSTINA PRADO DIAZ, y mis otros dos hermanos de nombre MARIA DE LOS ANGELES PRADO DIAZ, JOSE DE JESUS PRADO DIAZ y el suscrito JOSÉ LUIS PRADO DIAZ; estos dos últimos se encuentran de acuerdo en que el firmante sea judicialmente el Tutor Definitivo de nuestra hermana AGUSTINA PRADO DIAZ, y reconocen que ella misma, cuando se encontraba en completo estado de salud me confió la administración de sus bienes e inversiones además de que confirman que el suscrito es quien cuida, atiende, protege y vela para brindar una mejor calidad de vida a nuestra hermana AGUSTINA PRADO DIAZ; ya que me encuentro viviendo desde hace muchos años con la misma. Estas manifestaciones de aprobación de la Tutoría Definitiva del suscrito para mi hermana, fueron realizados ante Notario Público, correspondiente a la entidad en donde viven mis hermanos y las cuales se anexan al presente. 6.- como ya lo mencioné, con el pasar del tiempo, a consecuencia de su edad, mi hermana AGUSTINA PRADO DIAZ, padece de Demencia Senil, situación que le es imposible tomar decisiones y realizar trámites legales y de negocios; motivo por el cual, el suscrito promuevo las presentes diligencias con el fin de que sea declarado el estado de interdicción de mi hermana y así mismo se me nombre como tutor definitivo, a fin de que el suscrito represente a mi hermana en los actos que pudieran llevarse a cabo durante la incapacidad de la misma.

Los actos de instrucción u otros actos judiciales a realizar.

1) se sirva informar el historial del contrato y la fecha de inicio de la cuenta 3696 en la que aparecen como titular y cotitular, las ciudadanas Agustina Prado Díaz y María Reva West, respectivamente, así como cuando se fusionaron dichas personas en el contrato de la cuenta mencionada, las cantidades aportadas, rendimientos producidos y que se han reinvertido, además la participación que en la cuenta referida le corresponde a las ciudadanas Agustina Prado Díaz y María Reva West; ello a fin de estar en posibilidad proveer lo conducente a la administración de los bienes de Agustina Prado Díaz, quien fuera declarada incapaz en el asunto que nos ocupa.

Los nombres y direcciones de las personas a oír.

Justin Chen, CAMS CRCP Chief Compliance Officer Banorte-IXE Securities International, Ltd., con domicilio en 140 East 45th Street-32nd Floor New York, NY, 10017 Estados Unidos de América.

Los documentos u otros objetos a examinar.

Sin anexos.

Lo anterior, a fin de que en auxilio de las labores de este juzgado se sirva diligenciar el presente proveído, debiendo para tal efecto gestionar las documentales referidas y realizado que lo sea, se devuelva a este su lugar de origen, seguro de reciprocidad en casos análogos. Ello de conformidad con los artículos 26, 47, 227 y 952 del Código de Procedimientos Civiles vigente en el Estado, así como con el artículo 44 fracción V de la Ley del Servicio Exterior Mexicano y el numeral 87 del Reglamento de la Ley del Servicio Exterior Mexicano. Notifíquese. Así lo acuerda y firma el ciudadano licenciado Javier Arturo Hurtado Leija, Juez Primero de lo Familiar del Cuarto Distrito Judicial del Estado, actuando ante la presencia de la ciudadana licenciada María Lourdes

ESTADOS UNIDOS MEXICANOS
PODER JUDICIAL DEL
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DEL PRIMER DISTRITO JUDICIAL
SAN PEDRO GARZA GARCÍA, N.L.

González García, secretario que autoriza. Doy fe. Rubricas. La resolución que antecede se publicó en el boletín judicial número 6577 del día 23 veintitrés de abril del año 2015 dos mil quince. Lo anterior de conformidad con el artículo 76 del Código de Procedimientos Civiles vigente en el Estado. Doy fe. Rubrica: Ciudadana Secretario.

PARA QUE LO QUE POR MI MANDATO TENGA SU FIEL Y LEGAL CUMPLIMIENTO, EN NOMBRE DE LOS PODERES DE LA NACIÓN Y DE LOS PARTICULARES DEL ESTADO DE NUEVO LEÓN, EXHORTO Y REQUIERO, QUE TAN PRONTO SE ENCUENTRE EL PRESENTE EN SU PODER SE SIRVA DILIGENCIARLO EN SUS TÉRMINOS, SEGURO DE MI RECIPROCIDAD EN CASOS ANÁLOGOS, VA EN 02 DOS FOJAS ÚTILES, Y ES DADO EN SAN PEDRO GARZA GARCIA, NUEVO LEÓN, A 29 VEINTINUEVE DE ABRIL DEL 2015 DOS MIL QUINCE. DOY FE.

EL C. JUEZ DEL JUZGADO PRIMERO DE LO FAMILIAR DEL CUARTO DISTRITO JUDICIAL EN EL ESTADO DE NUEVO LEÓN.

LIC. JAVIER ARTURO HURTADO DE LA JEA.

EST. A. E. NUEVO LEÓN
JUEZ SUPLENTE DE LO FAMILIAR
DEL CUARTO DISTRITO JUDICIAL
C. SECRETARIO DEL JUZGADO PRIMERO
DE LO FAMILIAR DEL CUARTO DISTRITO
JUDICIAL EN EL ESTADO.

LIC. NORMA NELY CARREÑO RAMÍREZ.

ERJCA*

Patricia González-González

Certified Translator

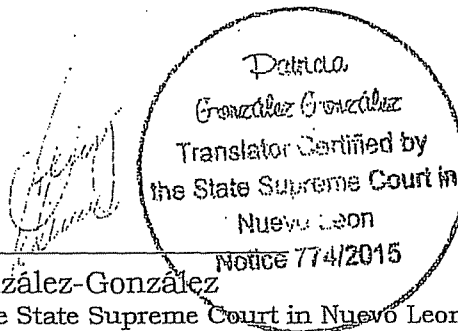
Jiménez #465, Floor 2, Suite 2 | Col. Centro
San Pedro Garza García, N.L., México 66200
Tel (81) 8356.12.00 | Mobile (181) 1255.8554

COPY

May 07, 2015

Certification by Translator

I, Patricia González, hereby certify that I am fluent in English and Spanish languages, and that the attached document is an accurate English translation of the original Spanish-language document. I declare under penalty of perjury that, to the best of my knowledge and belief, the foregoing is true and correct.



Patricia González-González

Certified by the State Supreme Court in Nuevo Leon, Mexico

Certification No. 774/2015

ATA member 240784

COPY

<p>[Emblem of the United Mexican States that says: JUDICIARY OF THE STATE OF NUEVO LEÓN, FIRST FAMILY COURT OF THE FOURTH JUDICIAL DISTRICT, SAN PEDRO GARZA GARCÍA, N.L.]</p>	<p>[Barcode] IF140048359305 PROCEDURES PRESENTATION OF EVIDENCE / LETTER ROGATORY Dossier: 1335 / 2013 0042</p>
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San Pedro Garza García, Nuevo León, April 23 twenty-three 2015 two thousand and fifteen.

Consider received the pleading signed by José Luis Prado Díaz and María de Lourdes Ayala Leal with the capacity in which they are acting as stated in the records incorporated in judicial dossier number 1335/2013, relating to the present voluntary jurisdiction proceedings on the declaration of a state of interdiction and appointment of a guardian for Agustina Prado Díaz.

Regarding to the contents of your request, have the appearing parties filed the decree ordered on April 14 of this year, stating the declarations mentioned in the document, which having noted its content and add it to its recitals in order to become effective in all legal purposes, the foregoing according to the provided in articles 51 and 55 of the Code of Civil Procedures of the State.

Regarding to your special petition, let a letter rogatory (international letter rogatory) be sent in triplicate, through the Nuevo León Regional Office of the Legal Affairs Department of the Ministry of Foreign Affairs, to the Department of Justice of the United States of America, for it, in support of the work of this court, to kindly send an official letter to:

I. Justin Chen, CAMS CRCP Chief Compliance Officer Banorte- IXE Securities International, Ltd., addressed at 140 East 45th Street- 32nd Floor New York, NY 10017 United States of America, for him to do the following:

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Guadalupe
Translater
the State Supremacy
Nuevo León
Notice 774/2015

please report the track record of the contract and the starting date of account number 3696 [REDACTED] in which Agustina Prado Díaz and Maria Reva West appear as holder and joint name, respectively, as well as when said people merged in the contract for the aforementioned account, the amounts contributed, returns that have been produced and that have been reinvested, as well as the share in the aforementioned account that corresponds to Agustina Prado Díaz and María Reva West; this is in order to be in a position to make any decision on the administration of the assets of the cited Agustina Prado Díaz, who was declared incapable for the matter in question.

Therefore, in compliance with the requirements set forth in article 3 of the Hague Convention on Taking of Evidence Abroad in Civil or Commercial Matters, you are informed of the following:

Claimant authority and responding authority.

- 1.- Claimant authority: Judge of the Family Court of the Fourth Judicial District in the State of Nuevo León, Mexico.
- 2.- Responding authority: Judge in jurisdiction at the domicile located at 140 East 45th Street- 32nd Floor New York, NY 10017 United States of America.

Identity and address of the parties and, when applicable, of their representatives.

Petitioner and guardian of the incapable. Agustina Prado Díaz: José Luis Prado Díaz, Mexican, of legal age, married, employee, addressed at Calle Circunvalación, number 201, Colonia Protexa, Santa Catarina, Nuevo León, Mexico.

Legal Guardian of the incapable. Agustina Prado Díaz: María de Lourdes Ayala Leal, Mexicana, of legal age, married, lawyer, domiciled at Calle Calzada del Valle, number 277- 3 poniente, Colonia del Valle, San Pedro Garza García, Nuevo León, Mexico.

Representatives of José Luis Prado Díaz: Claudia Verónica Solís Ruiz, domiciled at Calle Circunvalación, number 201, Colonia Protexa, Santa Catarina, Nuevo León, Mexico.

Nature and purpose of the instance along with a brief summary of the facts.

The voluntary jurisdiction proceedings on the declaration of a state of interdiction and appointment of a guardian for Agustina Prado Díaz, heard by this authority under dossier number 1335/2013, which was declared admissible in a final judgment passed on June 17th

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Notice 77
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Pre-trial proceedings and judicial acts to be done.

Names and addresses of the people to be served process.

The documents or other objects to be examined.
No attachments.

The foregoing in order that, in support of the work of this court, send this document, arranging, to that end, the aforementioned documentary evidence and, having done so, returning it to its place

of origin, with the assurance that we will be glad to reciprocate in similar cases. All this in compliance with the articles 26, 47, 227, and 952 of the Code of Civil Procedures (*Código de Procedimientos Civiles*) in force in the State, as well as with article 44 subsection V of the Mexican Foreign Service Law (*Ley del Servicio Exterior Mexicano*) and numeral 87 of the Regulations of the Mexican Foreign Service Law.

Let notice be given.- Javier Arturo Hurtado Leija, Judge of Family Court One of the Fourth Judicial District of the State, so rules and signs, as witnessed by María Lourdes González García, Court Clerk. I do attest.-

The above ruling was published in court bulletin number 6540 on February 25th twenty-fifth 2015-two thousand and fifteen, the foregoing for purposes of articles 76 and 77 of the Code of Civil Procedures of the State.- I do attest.-

Court Clerk

L/MLGG/CMS

DATA OF THE DOSSIER:

CASE: ORDINARY CIVIL LAWSUIT ON THE STATE OF INTERDICTION AND APPOINTMENT OF A GUARDIAN.

PLAINTIFF: JOSE LUIS PRADO DIAZ
DEFENDANT: RE. AGUSINA PRADO DIAZ

04 - USERS TV:

*PARTY TYPE: Plaintiff *PARTY: JOSE LUIS PRADO DIAZ *USER T.V.: claudiasolis

*DATE OF ACTIVATION: 09/20/2013 *SUBMISSIONS: NO *NOTIFICATIONS: YES

*PARTY TYPE: Other *PARTY: MARIA DE LOURDES AYALA LEAL *USER T.V.:

lauracos *DATE OF ACTIVATION: 08/05/2014 *SUBMISSIONS: NO *NOTIFICATIONS:

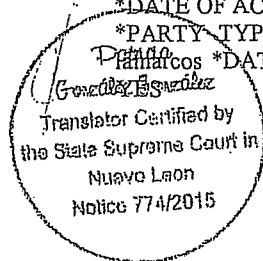


EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE: : *EX PARTE ORDER*
 :
LETTER ROGATORY FOR : M 11-120
INTERNATIONAL JUDICIAL :
ASSISTANCE FROM THE FOURTH :
JUDICIAL DISTRICT OF NUEVO LEON, :
MEXICO IN THE MATTER OF :
JOSE LUIS PRADO DIAZ AND MARIA :
DE LOURDES AYALA v. AGUSTINA :
PRADO DIAZ :
-----X

WHEREAS, the United States of America, by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, on behalf of the Fourth Judicial District of Nuevo Leon, Mexico, is seeking to obtain information from Banorte-Ixe Securities International, Ltd., in New York, New York, for use in connection with a judicial proceeding pending in that court captioned *Jose Luis Prado Diaz & Maria de Lourdes Ayala v. Agustina Prado Diaz*;

NOW THEREFORE, it is hereby ORDERED, pursuant to 28 U.S.C. § 1782(a) and Rule 28(a) of the Federal Rules of Civil Procedure, that Jacob Lillywhite, Assistant United States Attorney, Southern District of New York, be and hereby is appointed as Commissioner, to take such lawful steps as are necessary to obtain information from Banorte-Ixe Securities International, Ltd. and to submit said information to the United States Attorney for the Southern District of New York for transmission to the United States Department of Justice or its designee.

IT IS FURTHER ORDERED that the United States Attorney's Office shall serve Banorte-Ixe Securities International, Ltd. with a copy of this Order and the accompanying documents.

Dated: New York, New York
_____, 2015

UNITED STATES DISTRICT JUDGE